

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2013 JAN -8 PM 4:03

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DEPUTY CLERK

UNITED STATES OF AMERICA

v.

RICHARD D. ANDERSON

§
§
§
§

No.

4 - 13 CR - 003 - A

INDICTMENT

The Grand Jury Charges:

Count One

Possession of Visual Depictions of a Minor Engaged in Sexually Explicit Conduct
(Violation of 18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2))

On or about September 28, 2012, in the Fort Worth Division of the Northern District of Texas, the defendant **Richard D. Anderson** knowingly possessed matter that contains more than three visual depictions that have been shipped and transported using the internet, which is a means and facility of interstate and foreign commerce, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, and the visual depiction is of such conduct.

Included among the images possessed by **Anderson** on one Western Digital Portable Hard Disk Drive, serial number WXC508K25483, were the following three described movie and image files depicting minors engaged in sexually explicit conduct and the lascivious exhibition of the genitals and pubic area of said minors, as defined in 18 U.S.C. § 2256(8)(A):

File Path	Description of image
C\Sync\MOVIES\PTHC babysivid-bathfuck- gigarare(divx).avi	Movie file depicting sexual intercourse between a nude adult male and a nude prepubescent female in a bathtub
C\Sync\MOVIES\!!!NEW mandy sucking divx.avi	Movie file depicting a minor female wearing a long-sleeve purple shirt performing oral sexual intercourse on an adult male
C\UNINSPIC\natasha001.jpg	Still image depicting a blonde-haired minor performing oral sexual intercourse on an adult male wearing unzipped jeans

In violation of 18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2).

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of the offense alleged in Count One and pursuant to 18 U.S.C. § 2253(a), defendant **Anderson** shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. § 2252 and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the defendant includes, but is not limited to, any interest of the defendant in the following:

[Rest of page intentionally left blank]

1. One Dell Dimension 8400 computer, serial number J26ZT51; and
2. One Western Digital Portable Hard Disk Drive, Serial number WXC508K25483,

which were seized pursuant to a warrant by Fort Worth Police on or about September 28, 2012.

A TRUE BILL

Anderson L. Pugle
FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

Aisha Saleem
AISHA SALEEM
Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

VS.

RICHARD D. ANDERSON

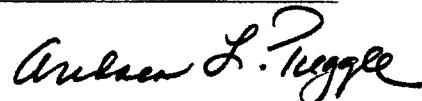
INDICTMENT

18 U.S.C. § 2252(a)(4)(B) and 2252(b)(2)
Possession of Visual Depictions of a Minor Engaged
in Sexually Explicit Conduct

18 U.S.C. § 2253
Forfeiture

A true bill rendered:

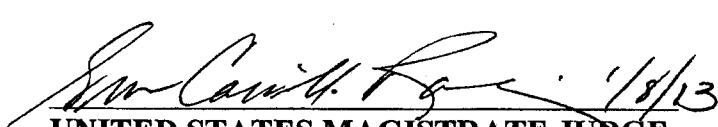
FORT WORTH



FOREPERSON

Filed in open court this 8th day of January, 2013.

Warrant to Issue



1/8/13

UNITED STATES MAGISTRATE JUDGE